

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**KERRY ROBINSON, on behalf of
himself and all others similarly
situated,**

Plaintiff,

v.

**GENERAL INFORMATION
SERVICES, INC.,**

Defendant.

C.A. No. 11-7782

CLASS ACTION

MOTION TO PERMIT FILING UNDER SEAL

Plaintiff Kerry Robinson, by counsel, respectfully requests that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiff's Motion For Attorneys' Fees and Reimbursement of Expenses ("Motion"), and assigns the following reasons in support thereof.

1. In accordance with the Confidentiality Protective Order of this Court entered December 19, 2012 (Doc. 28)), Plaintiff has marked the documents contained in Exhibit A attached to Appendix 1 to the Motion (Declarations of James A. Francis) as confidential.

2. The documents marked confidential contain attorney work product materials, and information protected by attorney-client privilege. No public interest is served by the disclosure of this information other than to the Court and the parties of this litigation as necessary to resolve Plaintiff's Petition for Attorneys' Fees and Reimbursement of Expenses.

3. Pursuant to the Confidentiality Protective Order, at paragraph 5, and Local Rule 5.1.5(a)(2), documents in this case may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiff Kerry Robinson respectfully requests that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiff to file under seal documents designated as “Confidential.”

Dated: October 24, 2014

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis
JAMES A. FRANCIS
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Attorneys for Plaintiffs and the Class

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**GENERAL INFORMATION
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Defendant.

C.A. No. 11-7782

CLASS ACTION

[PROPOSED] ORDER ALLOWING FILING UNDER SEAL

This matter is before the Court on the Plaintiff's Motion to Permit Filing Under Seal of certain documents relating to Plaintiff's Motion for Attorneys' Fees and Reimbursement of Expenses contained in Exhibit A attached to Appendix 1 (Declarations of James A. Francis) and marked as confidential. Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

IT IS SO ORDERED, this _____ day of _____, 2014.

HON. PETRESE B. TUCKER, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on the date below, a true and correct copy of the foregoing was served via the Court's ECF Notification system upon all counsel of record.

Dated: October 24, 2014

s/ James A. Francis
James A. Francis